

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA,
ex rel. ALEX DOE, Relator,

THE STATE OF TEXAS,
ex rel. ALEX DOE, Relator,

THE STATE OF LOUISIANA,
ex rel. ALEX DOE, Relator,

Plaintiffs,

V.

PLANNED PARENTHOOD
FEDERATION OF AMERICA, INC.,
PLANNED PARENTHOOD GULF
COAST, INC., PLANNED
PARENTHOOD OF GREATER
TEXAS, INC., PLANNED
PLANNED PARENTHOOD SOUTH
TEXAS, INC., PLANNED
PARENTHOOD CAMERON
COUNTY, INC., PLANNED
PARENTHOOD SAN ANTONIO,
INC.,

Defendants.

Civil Action No. 2-21CV-022-Z

FILED IN CAMERA AND
UNDER SEAL PURSUANT TO
31 U.S.C. § 3730(b)

DO NOT ENTER INTO PACER

SUMMONS IN A CIVIL ACTION

To: United States of America
c/o United States Attorney General
Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530

Relator Alex Doe has filed a *qui tam* lawsuit on behalf of the United States of America, the State of Texas, and the State of Louisiana, against defendants Planned Parenthood Federation of America, Inc., Planned Parenthood Gulf Coast, Inc.,

Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc., for treble damages and civil penalties pursuant to the False Claims Act, 31 U.S.C. §§ 3729 *et seq.*, the Texas Medicaid Fraud Prevention Act, Tex. Hum. Res. Code §§ 36.001 *et seq.*, and the Louisiana Medical Assistance Programs Integrity Law, La. Rev. Stat. §§ 46:437.1 *et seq.*

A copy of the complaint is attached hereto and is served on the United States Government pursuant to 31 U.S.C. § 3730(b)(2) and Rule 4 of the Federal Rules of Civil Procedure.

Pursuant to 31 U.S.C. § 3730(b)(2) the complaint has been filed in camera and shall remain under seal for at least 60 days and shall not be served on the defendants until the court so orders.

Pursuant to 31 U.S.C. § 3730(b)(2)-(4), within 60 days after service of this summons and complaint on you, the government must either elect to intervene and proceed with the action, notify the court that the government declines to take over the action, or move the court for an extension of time during which the complaint remains under seal.

You must file your response with the court in camera and under seal and serve the relator's attorneys whose names and address are:

Andrew B. Stephens
Heather G. Hacker
Hacker Stephens LLP
108 Wild Basin Rd. South, Suite 250
Austin, Texas 78746

Date: March 2, 2021



CLERK OF COURT

/s/ D. Aguilera, Deputy Clerk

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To: United States of America
c/o Civil Process Clerk
United States Attorney's Office for the Northern District of Texas
1100 Commerce Street, Third Floor
Dallas, Texas 75242

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